

**U.S. Department of Justice**

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March 3, 2025

The Honorable Matthew J. Maddox  
U.S. District Court Judge  
U.S. District Courthouse  
101 West Lombard Street  
Baltimore, MD 21201

RE: United States v. Dominique Makle, et al.  
Crim No.: MJM-22-0295

Dear Judge Maddox:

Per the Court's request, I am providing an update to the Court. The Government has inquired with each remaining party about the status or resolution of their respective cases. In regard to both Mr. Makle and Mr. Stewart, both counsel have requested an additional 30 days to continue to negotiate the case. As to Mr. Scovens, the parties are in the process of scheduling a reverse proffer with the hope that a resolution may result. That reverse proffer will be with both newly hired counsel, Mr. Donald Wright, and his client. Although a date has not yet been set, it is anticipated to be set sometime in mid-April when the Government has concluded a trial on another matter. Additionally, Mr. Wright still needs time to review the discovery in this case.

As a result of the continued efforts to resolve this matter, the Government requests a status update in 45 days.

I thank the Court for its consideration of this matter.

Sincerely,

Philip A. Selden  
Acting United States Attorney

*LaRai Everett*  
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